

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

V.

TABITHA D. ROBINSON

Case No.

08 CR

871

Magistrate Judge Nan R. Nolan

AFFIDAVIT IN REMOVAL PROCEEDING

I, BELKIS CANTOR, personally appearing before United States Magistrate Judge NAN R. NOLAN and being duly sworn on oath, state that as a federal law enforcement officer I have been informed that TABITHA D. ROBINSON (hereinafter "Robinson"), has been charged by Complaint in the Southern District of Illinois with the following criminal offenses: conspiracy to produce child pornography, in violation of Title 18, United States Code, Section 2251(a) and (e), and conspiracy to transport minors with intent to engage in criminal sexual activity, in violation of Title 18, United States Code, Section 2423(a).

A copy of the Complaint is attached. I have been informed through official channels that a warrant for the arrest of Robinson has been issued pursuant to the Complaint. A copy of the arrest warrant also is attached.

FILED

OCT 28 2008 TC

10-28-08

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

xlba

BELKIS CANTOR
Deputy U.S. Marshal
United States Marshals Service

SUBSCRIBED AND SWORN to before me this 28th day of October, 2008.

Wesley R. Holm

NAN R. NOLAN
United States Magistrate Judge

FILED

OCT 27 2008

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
LOUISE HELEN MASULLA,)
TABITHA D. ROBINSON, and)
WILLIAM M. MILLIGAN)
)
Defendants.)

CASE NUMBER 08-Mj-3075 DGW

CRIMINAL COMPLAINT

I, Michael Bazzell, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

COUNT 1
(Conspiracy to Produce Child Pornography)

Between on or about July 22, 2008, and on or about August 10, 2008, in Madison County, Illinois, within the Southern District of Illinois and elsewhere, defendants,

**LOUISE HELEN MASULLA,
TABITHA D. ROBINSON, and
WILLIAM M. MILLIGAN,**

did conspire, confederate, and agree with one another to employ, use, persuade, induce, entice and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing or having reason to know that such visual depiction would be transported in interstate or foreign commerce or mailed, or that such visual depiction would be produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce, by any means, including by computer, and which visual depiction has been transported in interstate or foreign commerce, all in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT 2

(Conspiracy to Transport Minors with Intent to Engage in Criminal Sexual Activity)

Between on or about July 22, 2008, and on or about August 10, 2008, in Madison County, Illinois, within the Southern District of Illinois and elsewhere, defendants,

**LOUISE HELEN MASULLA,
TABITHA D. ROBINSON, and
WILLIAM M. MILLIGAN,**

did conspire, confederate, and agree with one another to transport an individual who had not attained the age of 18 years in interstate commerce, with intent that the individual engage in any sexual activity for which any person can be charged with a criminal offense, all in violation of Title 18, United States Code, Section 2423(a).

COUNT 3

(Aggravated Sexual Abuse)

Between on or about August 9, 2008 and on or about August 10, 2008, in Madison County, Illinois, within the Southern District of Illinois and elsewhere, defendant,

LOUISE HELEN MASULLA,

crossed a State line with intent to engage in a sexual act with a person who has not attained the age of 12 years, all in violation of Title 18, United States Code, Section 2241(c).

COUNT 4

(Transportation of Child Pornography)

On or about July 22, 2008, in Madison County, Illinois, within the Southern District of Illinois and elsewhere, defendant,

LOUISE HELEN MASULLA,

knowingly transported and attempted to transport a visual depiction in interstate or foreign

commerce by any means, including by computer, the producing of such visual depiction having involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A), and such depiction was of such conduct, to wit: a video file titled Video 3.wmv, all in violation of Title 18, United States Code, Section 2252(a)(1) & (b)(1).

COUNT 5
(Receipt of Child Pornography)

On or about July 22, 2008, in Madison County, Illinois, within the Southern District of Illinois and elsewhere, defendant,

WILLIAM MILLIGAN,

knowingly received visual depictions that had been mailed, shipped and transported in interstate or foreign commerce, or which contained materials which had been mailed and so shipped and transported, by any means including by computer, the producing of such visual depictions having involved the use of minors engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A), and such depictions being of such conduct, to wit: a video file titled Video 3.wmv, all in violation of Title 18, United States Code, Section 2252(a)(2) & (b)(1).

I further state that I am a Special Federal Officer and that this complaint is based on the following facts:

At all times material to this criminal complaint:

1. Defendant Louise Helen Masulla was residing in Alton, Illinois, within the Southern District of Illinois. Masulla had in her care a female minor who was 11 years old who is identified herein as Jane Doe 11.

2. Defendant Tabitha D. Robinson was residing in Midlothian, Illinois. Robinson had in her

care a female minor who was 3 years old who is identified herein as Jane Doe 3.

3. The child victims herein are referred to as "Jane Does" pursuant to Title 18, United States Code, Section 3509 which protects the privacy interests of minor victims.

4. Defendant William Milligan resided in the Bloomington, Indiana, area.

5. This investigation started on or about September 28, 2008, as a result of a report made to the Alton, Illinois, Police Department regarding criminal sexual conduct by Masulla involving a child and activities occurring in internet chat rooms. On October 6, 2008, as a result of the Alton Police Department's investigation, the State of Illinois charged Masulla with five counts of Predatory Criminal Sexual Assault of a Child. The charges allege that Masulla sexually molested a child on several occasions in Alton, Illinois.

6. During an interview with Masulla, she began informing detectives about sexual offenses involving children and other individuals. Masulla told detectives that she had transported Jane Doe 11 to an unknown hotel in Effingham, Illinois. During this incident, which Masulla approximated as having occurred in August, 2008, Masulla, Tabitha Robinson, and William Milligan utilized a digital camera to produce photographs of Jane Doe 11 naked. One of these photographs displayed Masulla holding Jane Doe 11's legs spread apart, exposing her genitals. The camera used in this incident belonged to Robinson. Robinson later transmitted these photographs over the internet through Yahoo Chat service to Masulla. Masulla stated that she then transmitted the same photographs depicting child pornography to at least five unknown men through the internet. Also during this incident in the hotel, Jane Doe 3, a child in the care of Robinson, was present. Louise Masulla stated that nude photographs were taken of Jane Doe 3 and that both Jane Doe 3 and Jane Doe 11 were nude in a hot tub on the lap of Milligan. Masulla stated that during this incident, she

touched the buttocks of Jane Doe 3 and the breast area of Jane Doe 11.

7. As detailed herein, further investigation has revealed that while Masulla referred to an incident in an Effingham hotel, the incident occurred in a hotel in Terre Haute, Indiana.

8. On October 3, 2008, Masulla voluntarily went to the Alton Police Department to be interviewed a second time. Masulla was interviewed by myself and Alton Police Detective Jennifer Tierney. During this interview, Masulla expanded on the details of the visit to the Effingham hotel [which investigators have determined actually took place in Terre Haute]. Masulla stated that during this incident, herself, Robinson, and Milligan arrived at the hotel with the intent to sexually molest and manufacture child pornography of Jane Doe 11 and Jane Doe 3. Previous to the incident, Masulla communicated with Milligan via internet chat rooms about the details of molesting the children. Masulla viewed digital photographs taken from her computer during a forensic

AUSA Jason A. Yonan (312) 353-4156

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these individuals through an online relationship. Robinson stated that the purpose of this trip was for a sexual encounter, and admitted to bringing Jane Doe 3 from Illinois to Indiana. Masulla brought Jane Doe 11 from Illinois to Indiana. Robinson further admitted that the encounter was planned through internet chat, and that communication had occurred in reference to molestation of the children. Robinson further stated that she possessed a camera during this incident which was utilized by the three adults involved in this incident. Some of the photographs included the two children nude as well as the adults nude. This gathering occurred in a hotel in Terre Haute, Indiana, and involved sexual activity by Robinson, Masulla, Milligan, Jane Doe 11 and Jane Doe 3. Robinson provided investigators with copies of her bank account statements. Those statements reflect that Robinson's debit card was billed by Best Western in Terre Haute, Indiana, on August 12, 2008; her debit card was billed by Fairfield Inn Suites, Effingham, Illinois, on July 22, 2008. Robinson explained that there were two sex parties. The first occurred in a hotel in Effingham, Illinois, and involved only adult sex between Tabitha Robinson, Louise Masulla and William Milligan; during the sexual encounter, the children were allegedly in another hotel room. The second sex party occurred in a hotel in Terre Haute, Indiana, and involved sex with Tabitha Robinson, Louise Masulla, William Milligan, Jane Doe 11 and Jane Doe 3.

10. During the interview of Robinson, Detective Tony Stack obtained information about the identity of William Milligan. According to Robinson, she emailed Milligan a video of herself and Jane Doe 3 (who was then approximately two years old). In the video, Robinson is masturbating and Jane Doe 3 is mimicking her. Investigators have recovered an email from Robinson's computer which reveals that Robinson sent a personal video to Milligan on September 7, 2007. I was advised by Det. Stack that the video was also recovered from Robinson's computer.

11 The analysis of Tabitha Robinson's computer revealed Yahoo! messenger internet chat logs which include conversations featuring Tabitha Robinson; Louise Masulla; and William Milligan. For example, on August 2, 2008, Robinson told Masulla that her "monthly visitor" comes "next weekend. . . the weekend that is supposed to be fun and exciting!" Robinson stated, "I will probably be in excruciating pain on Friday. . . and Sat. . . well, I told Will I will probably be miserable so I might be in the hot tub most of the time."

12. An analysis of Louise Masulla's computer revealed 12 still photographs which included photographs of Masulla on a bed naked; Robinson in a hot tub naked; and Robinson performing oral sex on a black male. (Milligan is African-American). The backgrounds of these 12 images indicate that they were all taken in the same place and in a hotel room. The website of the Best Western in Terre Haute includes photos of the guest rooms. The bedspread, curtains, headboard and chair upholstery in the images possessed by Masulla match the photos of the guest rooms on the Best Western Terre Haute website. Both Masulla and Milligan have identified the African-American male in the images as Milligan.

13. On Tabitha Robinson's computer, thumbnail images of Jane Doe 3 and Jane Doe 11 were recovered. The images reveal Jane Doe 3 and Jane Doe 11 engaging in sexually explicit conduct with Masulla. The background of the images is similar to the background of the images described in the preceding paragraph. These thumbnail images were also recovered from Louise Masulla's computer.

14. On October 22, 2008, I received a package from Yahoo as a response to a search warrant presented to Yahoo. This package included a compact disc containing e-mail content from the e-mail accounts of the subjects involved in this investigation. Thus far, only a preliminary review has been

conducted of the material from Yahoo, as it is voluminous. While viewing the content of the data received from Yahoo, I observed suspected child pornography delivered through e-mail messages.

a. While viewing the mail content of Louise Masulla, the following messages were located containing suspected child pornography:

1. On July 22, 2008 at 4:52pm, an e-mail message was delivered from Masulla to Milligan titled "Logitech® Mail". The message of the email stated "The attached file(s) have been captured using a Logitech(R) webcam. To open a file from your e-mail application, double-click on the attachment. To open a file from Windows, save the attached file onto your hard disk, then double-click on the file to view it. Click on the link below if you are having problems viewing the attached file. http://www.logitech.com/videomail_help". The only attachment was a video file titled Video 3.wmv. This video file depicted a female child lifting her shirt and squeezing her breasts together. The child's face is not visible.

2. On July 22, 2008 at 9:54pm, an e-mail message was delivered from Masulla to Milligan. The message of the email stated "The attached file(s) have been captured using a Logitech(R) webcam. To open a file from your e-mail application, double-click on the attachment. To open a file from Windows, save the attached file onto your hard disk, then double-click on the file to view it. Click on the link below if you are having problems viewing the attached file. http://www.logitech.com/videomail_help". The only attachment was a video file titled Video 3.wmv. This video file depicted a female child, which appears to be Jane Doe 11, lifting her shirt, lowering her underwear, and exposing both her breasts and genital region. The face of the child is visible in portions of this video. A hand of the photographer is also visible in a portion of the video.

b. While viewing the mail content of William Milligan, the following messages were

located containing suspected child pornography.

1. On July 22, 2008 at 4:52pm, an e-mail message was delivered from Masulla to Milligan titled "Logitech® Mail". The message of the email stated "The attached file(s) have been captured using a Logitech(R) webcam. To open a file from your e-mail application, double-click on the attachment. To open a file from Windows, save the attached file onto your hard disk, then double-click on the file to view it. Click on the link below if you are having problems viewing the attached file. http://www.logitech.com/videomail_help". The only attachment was a video file titled Video 3.wmv. This video file depicted a female child lifting her shirt and squeezing her breasts together. The child's face is not visible.

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3. On October 9, 2008, an e-mail message was delivered from Milligan to another subject who has not yet been identified. This message was titled "Fw: Logitech® Mail". The message of the email stated "The attached file(s) have been captured using a Logitech(R)

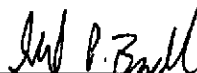
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15. While looking at e-mails sent from the account of Milligan, I located a message sent to Tabitha.robinson@affirmativeinsurance.com on August 7, 2008. This message provided driving directions from Midlothian, Illinois (where Tabitha Robinson lives) to Terre Haute, Indiana. A link to an online map was referenced, and this link appears to still be active. The link forwards to a web page displaying a mapquest map with driving directions from Midlothian, Illinois to Terre Haute, Indiana. The original subject of the e-mail was "map to the party lol".

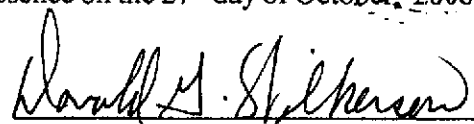
16. On October 27, 2008, members of the FBI Cyber Crime Task Force executed a search warrant at the residence of William Milligan in Bloomington, Indiana. A laptop computer was found during this search that belongs to William Milligan. A preview analysis conducted by the personnel executing the warrant located suspected child pornography stored on the hard drive of this computer. William Milligan was interviewed during this search. William Milligan stated that he had sexual contact with Jane Doe 11 and Jane Doe 3 in Terre Haute, Indiana. Milligan knew the true names of both of the children.

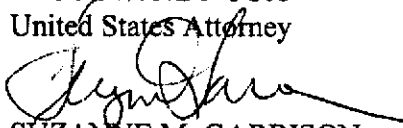
FURTHER AFFIANT SAYETH NAUGHT.


MICHAEL BAZZELL
Special Federal Officer
Federal Bureau of Investigation

State of Illinois)
)
County of St. Clair) SS.

Sworn to before me and subscribed in my presence on the 27th day of October, 2008, at East St. Louis, Illinois.


DONALD G. WILKERSON
United States Magistrate Judge

A. COURTNEY COX
United States Attorney

SUZANNE M. GARRISON
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TABITHA D. ROBINSON,

Defendant.

CASE NUMBER

08-MJ-3075 DGW

WARRANT FOR ARREST

TO: The United States Marshal and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest Tabitha D. Robinson and bring her
forthwith to the nearest Magistrate Judge to answer a complaint charging her with:

Conspiracy to Produce Child Pornography and Conspiracy to Transport Minors with
Intent to engage in Criminal Sexual Activity,

in violation of Title 18, United States Code, Sections 2251(a) and (e), and 2423(a).

DONALD G. WILKERSON

Name of Issuing Officer

Donald G. Wilkerson

Signature of Issuing Officer

Magistrate Judge

Title of Issuing Officer

East St. Louis, Illinois, October 27, 2008

Date and Location

(By) Deputy Clerk

Bail fixed at \$ _____ by _____
Name of Judicial Officer

RETURN

**This warrant was received and executed with the arrest of the above named
defendant at _____**

Date Received _____ Date of Arrest _____

**Name and Title of
Arresting Officer**

**Signature of Arresting
Officer**

THE FOLLOWING IS FURNISHED FOR INFORMATION ONLY:

Defendant's Name: Tolson

Alias

Last k

L 60445

Last K

Place c

Date of

Social S

Height:

Sex: Fem

White

Hair:

Scars, Tat

FBI Number:

Complete Description of Auto:

Investigative Agency and Address: Federal Bureau of Investigation, Fairview Heights, IL